



Suzanne Mantegna <smantegna@richmondvt.gov>

168 River Road

Pfeiffer, Rebecca <Rebecca.Pfeiffer@vermont.gov>
To: Suzanne Mantegna <smantegna@richmondvt.gov>
Cc: "Medash, Kyle" <Kyle.Medash@vermont.gov>

Tue, Aug 11, 2020 at 2:38 PM

Hi Suzanne –

The proposed 12' garage addition at the Patterson Fuel site (168 River Road, Richmond) is located in the Special Flood Hazard Area (SFHA). Given the small expansion onto the existing garage (dimensions appear to be 30'x30' of the existing garage, but it is not clear), I would recommend that the Town of Richmond assess the garage addition to determine if it would be considered a *substantial improvement*. A substantial improvement means that the improvement/rehabilitation/renovation to an existing structure would cost 50% or more of the current structures value (not including the land value or any other buildings on the lot). The regulations in the Richmond Zoning Regulations can be found in 6.8.7 *Substantial Improvement Determinations*. If it is determined that the garage addition *would* constitute a substantial improvement, then the applicant will need to provide additional information about how the existing garage, along with the addition, would meet the Town's Development Standards that apply to substantially improved buildings (6.8.16.a, 6.8.16.f or 6.8.16.g).

Given the small addition, my sense is that the garage addition *may not* meet the threshold of a substantial improvement. However, the Town should get an accurate cost estimate of the addition (including the cost of labor) and compare it to the current market value of the garage. The market value of the garage can be taken from the Richmond lister's records, or a recent real estate appraisal provided by the applicant if they have one available and are willing to provide it to the Town. I have attached a short guidance document on substantial improvement/substantial damage that can also be found on our website here.

If the Board determines that the garage addition is not a substantial improvement, then the garage addition would need to meet the general Development Standards in 6.8.16 of the Richmond Zoning Regulations that applies to *all development*. This would mean that the standards listed in 6.8.16.a) 1-6 should be met by the applicant:

a) All Development shall be reasonably safe from Flooding;

1. Designed, operated, maintained, modified, and adequately anchored to prevent flotation, collapse, release, or lateral movement of the Structure during the occurrence of the Base Flood;
2. Constructed with materials resistant to Flood damage;
3. Constructed by methods and practices that minimizes Flood damage;
4. Constructed with electrical, heating, ventilation, plumbing and air conditioning equipment and other service facilities that are designed and/or located so as to prevent water from entering or accumulating within the components during conditions of Flooding;
5. Adequately drained to reduce exposure to Flood hazards;
6. Located so as to minimize conflict with changes in Channel location over time and the need to intervene with such changes;

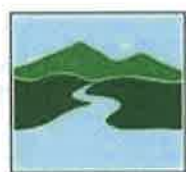
The Board should have testimony and evidence of how the addition will meet the standards of 6.8.16.a listed above. If the garage addition is determined not to be a substantial improvement, and is constructed in accordance with the standards listed above, then the project should meet the Town's flood hazard area development standards and should meet the minimum National Flood Insurance Program (NFIP) standards.

Please let me know if you have any additional questions about this project. As always, other State, Federal or local permits may be required for this project. The VT DEC Permit Specialist for your region should be able to help identify any other State Environmental Permits that may be necessary. These comments are offered in accordance with 24 VSA §4424.

Please let me know if you have any additional questions or would like to further discuss. I've also cc'd Kyle Medash, our new Regional Floodplain Manager who will be taking over projects in Chittenden County. I've cc'd him here to let him know about this project.

Best,

Rebecca



**WATERSHED
MANAGEMENT DIVISION**
RIVERS PROGRAM

Rebecca Pfeiffer, CFM | River Corridor & Floodplain Protection Program Manager

VT NFIP Coordinator/Northwest VT Floodplain Manager
111 West Street

Essex Junction, VT 05452

C 802-490-6157 | F 802-879-3871

Flood Ready Vermont: <http://floodready.vermont.gov/>

VT Flood Training: <http://floodtraining.vermont.gov/>

VT ANR Natural Resources Atlas: <http://anrmaps.vermont.gov/websites/anra/>

River Corridor & Floodplain Protection Website: <http://dec.vermont.gov/watershed/rivers/river-corridor-and-floodplain-protection>

From: Suzanne Mantegna <smantegna@richmondvt.gov>

Sent: Sunday, August 9, 2020 8:22 AM

To: Pfeiffer, Rebecca <Rebecca.Pfeiffer@vermont.gov>

Subject: 168 River Road

EXTERNAL SENDER: Do not open attachments or click on links unless you recognize and trust the sender.

[Quoted text hidden]